



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 26 2010

Mr. David Keith
Project Coordinator
Anchor QEA
2113 Government Street
Building D, Suite 3
Ocean Springs, MS 39654

RE: Comments and Approval on Draft Final Sampling and Analysis Plan: Sediment Study
San Jacinto River Waste Pits Superfund Site

Dear Mr. Keith:

The U.S. Environmental Protection Agency (EPA) has completed its review and approves of the *Draft Sampling and Analysis Plan: Sediment Study* (dated April 2010) for the San Jacinto River Waste Pits Superfund Site.

Please proceed with the implementation of this plan and provide the Final version to EPA and the Texas Commission on Environmental Quality, addressing the final comments in the enclosure to this letter.

Please feel free to contact me at (214) 665-8409, or by email at tzhone.stephen@epa.gov, if there are any questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen L. Tzhone", is written over a horizontal line.

Stephen L. Tzhone, RPM

Enclosure

cc: Ms. Ludmila Voskov, TCEQ
Ms. Jessica White, NOAA

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 23, 2010

Mr. Stephen Tzhone, Remedial Project Manager
U.S. EPA, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: *Draft Final Sampling and Analysis Plan: Sediment Study (SAP)*, dated April 2010
San Jacinto River Waste Pits Federal Superfund Site - comments
Harris County, Texas

Dear Mr. Tzhone:

The Texas Commission on Environmental Quality (TCEQ) Remediation and Toxicology Divisions and the Total Maximum Daily Load (TMDL) Program have completed review of the Draft Final Sampling and Analysis Plan: Sediment Study (SAP), dated April 2010. The Draft Final SAP was prepared by Integral Consulting Inc. and Anchor QEA, LLC. TCEQ has reviewed the comment responses (Appendix B) and revisions incorporated into the draft final SAP dated April 2010. The TCEQ comments are provided below.

TCEQ Comment 11 - Section 1.6.2, Benthic Macroinvertebrate Risk-Based Screen: Text indicates the SLERA provided as an Appendix to the RI/FS Workplan provides additional information on the proposed dioxin screening level. Review of the proposed screening of dioxin as a benthic chemical of concern is deferred until review of the SLERA is complete. This deferral in no way impedes implementation of the SAP. This information should be conveyed to the respondents.

TCEQ Comment 13, Section 1.7.1, Dioxins and Furans as an Indicator Chemical Group, on Page 24: Text indicates that dioxins and furans provide an appropriate indicator chemical group for the RI/FS. The section should be revised to state the primary COPCs will be evaluated in every sample. If in any sample the data user concludes no further action is warranted for the primary COPCs, the data user will then evaluate the secondary COPCs against the screening criteria to determine if the conclusion of 'no further action' is confirmed for the sampled location.

New Comment - Figure 6, Diagram of the CSM pathway: In this diagram, a distinction needs to be made between the recreational and subsistence fisher pathways, and both pathways need to be evaluated. Under the recreational visitor surface water is considered

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an incomplete exposure pathway. Surface water needs to be considered as a complete exposure pathway for recreational visitor. Additionally, the complete exposure pathway is indicated as being either significant or minor. Despite this distinction all complete pathways, whether or not they were identified as significant or minor, will need to be fully evaluated.

If you have any questions please, contact me at (512-239-6368), Tracie Phillips (512-239-2269) or John Wilder (512-239-2579).

Sincerely,



Ludmila Voskov, P.G., Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

LV/sr

cc: Tracie Phillips, Toxicology Division, TCEQ
John Wilder, Remediation Division, TCEQ